

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Jocelyn Newman, Circuit Court Judge

Appellate Case No. 2017-001124
Opinion No. 2019-UP-277
(filed July 31, 2019)

RECEIVED
AUG 29 2019
SC Court of Appeals

Reginald Andre Blanding, Wanda Blanding, and
Brittani Blanding, by and through her Guardian ad Litema,
Reginald Andre Blanding and Wanda Blanding, Plaintiffs,

Of whom, Reginald Andre Blanding, Wanda Blanding and
Brittani Blanding are Appellants,

v.

Leon Lott, in his official capacity, Respondent.


**MEMORANDUM IN SUPPORT OF
MOTION FOR COSTS ON APPEAL**

By unpublished opinion filed July 31, 2019, the South Carolina Court of Appeals affirmed the lower court's granting of summary judgment in favor of the Respondent Leon Lott, in his official capacity.

Rule 222(a), SCACR, provides that "costs shall be taxed against appellant when the appeal is dismissed or judgment on appeal is affirmed." See, Rule 222(a), SCACR. The Respondent submits that he qualifies as the prevailing party in this appeal. Therefore, as the prevailing party on appeal, the Respondent is entitled to an award of costs on appeal in accordance with Rule 222(b), SCACR, which includes the costs of printing his Final Brief and the cost of the trial transcript. The Respondent is also entitled to attorneys' fees in the amount of \$2,500.00, which is an amount set by order of the Supreme Court.

As a result, the Respondent moves this Court, pursuant to Rule 222(d), SCACR, for costs on appeal in the amount of \$2,690.92. The requested costs on appeal are set forth in the Statement of Costs on Appeal, which is also filed herewith.

LINDEMANN, DAVIS & HUGHES P.A.

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Counsel for Respondent Leon Lott

August 28, 2019

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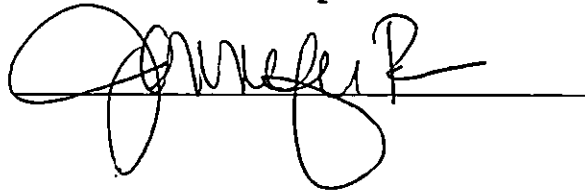
CERTIFICATE OF SERVICE

The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Respondent Leon Lott, does hereby certify that service of the **Motion for Costs on Appeal, Memorandum in Support of Motion for Costs on Appeal, and the Statement of Costs on Appeal** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class

postage prepaid, at the below listed addresses clearly indicated on said envelopes
this the 29th day of August 2019:

Deborah J. Butcher, Esquire
Robert J. Butcher, Esquire
The Camden Law Firm, P.A.
Post Office Box 610
Camden, South Carolina 29021

Robert D. Garfield, Esquire
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A handwritten signature in black ink, appearing to read "Robert D. Garfield", written over a horizontal line.



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August 29, 2019

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Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Reginald Andre Blanding, Wanda Blanding, and Brittani Blanding, by and through her Guardian ad Litem, Reginald Andre Blanding and Wanda Blanding v. Richland County Sheriff, Leon Lott
Appellate Case Number: 2017-001124
Civil Action Number: 2012-CP-40-2456
Our File Number: 314.8960

RECEIVED

AUG 29 2019

SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed for filing the originals and seven copies each of the **Motion for Costs on Appeal, Memorandum in Support of Motion for Costs on Appeal**, and the **Statement of Costs on Appeal** in the above referenced matter. Please file the originals and return a clocked-in copy of each document to me by way of my courier. I have also enclosed my firm's \$50.00 for the filing fee.

By copy of this letter, I am serving copies on all counsel of record. Thank you for your assistance in this matter. If you have any questions, please advise.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosures

The Honorable Jenny Abbott Kitchings
August 29, 2019
Page Two

cc: (w/ Enclosures)

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